

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:23-cv-22784-RNS

TINA PARKER,

Plaintiff,
v.

NCL (BAHAMAS) LTD.,

Defendant.

JOINT SCHEDULING REPORT

Plaintiff, TINA PARKER, and Defendant NCL (BAHAMAS) LTD., (collectively, the “parties”), pursuant to Rule 16.1(b) of the Local Rules for the Southern District of Florida (“S.D. Fla. L.R.”) and the Court’s August 3, 2023 Order Requiring Discovery and Scheduling Conference [DE 4], conferred telephonically on October 2, 2023, and hereby submit this Joint Scheduling Report.

Information required by S.D. Fla. L.R. 16.1(b)(2):

(A) Likelihood of Settlement.

The parties will attempt in good faith to resolve this matter and will notify the Court if they do so.

(B) Likelihood of Appearance in the Action of Additional Parties. It is unlikely that other parties will appear in this action.

(C) Discovery Schedule/Proposed Limits on Time. The parties propose the scheduling track set forth in Attachment “B” of the Court’s Order, dated August 3, 2023, also attached hereto, which is based on the standard case management track.

(D) Proposals for the Formulation and Simplification of Issues. At this time, the

parties do not have any proposals for the formulation and simplification of any issues. As the case progresses, the parties will, if appropriate, in good faith, confer to discuss proposals for the formulation and simplification of issues in this case.

(E) **Necessity of Amendments to Pleadings.** Plaintiff recently filed an Amended Complaint [DE 16]. NCL's response is currently due on or before October 13, 2023.

(F) **Admissions and Stipulations Which Will Avoid Unnecessary Proof.** The parties will work together to obtain admissions and stipulations that will avoid unnecessary proof at trial.

(G) **Suggestions for the Avoidance of Unnecessary Proof and of Cumulative Evidence.** The parties will work together to obtain admissions and stipulations that will avoid unnecessary proof and presentation of cumulative evidence at trial.

(H) **Referral of Matters to Magistrate Judge.** The parties do not currently consent to refer any matters to a Magistrate Judge.

(I) **Preliminary Estimate of the Time Required for Trial.** The parties believe this matter will require 3-5 days of trial.

(J) **Pretrial Conference and Trial Dates.** The parties request that the trial be scheduled to commence on or after 49 weeks after entry of the scheduling order as contemplated by the scheduling timeline for standard track cases (Attachment "B" to DE 4). The parties request that the pretrial conference be scheduled for four weeks before the trial period begins. Plaintiff has requested a jury trial in her Complaint.

(K) **Discovery and Electronically Stored Information (ESI).** The parties do not currently have any issues regarding ESI that need to be addressed by the Court.

(L) **Other Information Helpful to the Court in Setting the Case for Status or Pretrial Conference.** At this time, the parties do not have any other information that might be

helpful to the Court in setting the case for status or pretrial conference.

Respectfully submitted,

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& WINKLEMAN, P.A.
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CERTIFICATE OF SERVICE

I do hereby certify that on this 3rd day of October 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to electronically

receive Notices of Electronic Filing.

By: /s/ Carol L. Finklehoffe

SERVICE LIST

Tina Louise Parker vs. NCL (Bahamas) Ltd.

Case No.: 23-cv-22784-RNS

United States District Court for the Southern District of Florida

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